

United States District Court  
Southern District of Texas  
FILED

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

APR 11 2018

for the

Southern District of Texas

Clerk of Court

United States of America  
v.  
Marissa BARRERA, USC, YOB: 1981  
Precilla RUIZ, USC, YOB: 1977  
Hiram GARCIA, USC, YOB: 1967

Case No.

M-18-0759-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 10, 2018 in the county of Starr in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

Title 8 USC 1324

## Offense Description

knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, conceals, harbors, or shields from detection, or attempts to conceal, harbor, or shield from detection, such alien in any place, including any building or any means of transportation; engages in any conspiracy to commit any of the preceding acts, or aids or abets the commission of any of the preceding acts.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

approved by  
[Signature]

[Signature]  
Complainant's signature

Rolando Lerma Jr., HSI Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Date: 4/11/2018City and state: McAllen, Texas

[Signature]  
Judge's signature  
J. Scott Hacker, U.S. Magistrate  
Printed name and title

**Attachment "A"**

I, Rolando Lerma Jr., Special Agent with United States Immigration and Customs Enforcement, Homeland Security Investigations (HSI), being duly sworn, depose and say the following:

On April 10, 2018, U.S. Border Patrol Agents (BPAs) reported to HSI Special Agent Rolando Lerma Jr. that they and Starr County High Intensity Drug Trafficking Area (HIDTA) Task Force investigators had apprehended twenty-four (24) UDAs while attempting to conduct a knock and talk at the residence located in Roma, Texas.

BPAs had received information indicating that approximately twenty undocumented aliens (UDAs) were being harbored inside the home. As BPAs and HIDTA investigators approached the house to conduct a knock and talk at the house, they immediately observed one subject exit the residence and attempt to flee. BPAs apprehended the fleeing subject and subsequently encountered a total of twenty-four (24) UDAs inside the home.

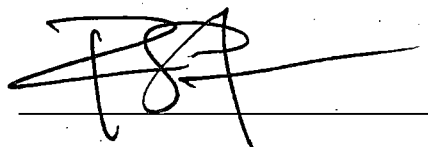
HSI Special Agents, interviewed (4) UDAs (material witnesses), who had been harbored at the location in Roma, Texas, Jeliser A. Cardona-Cardona, Mario A. Leon-Rodriguez, Freddy Villatoro-Hidalgo and Marvin G. Medrano-Morales. All stated that they were foreign nationals, namely citizens of Guatemala or Mexico with no legal status to be in the United States, and that they had arranged to be smuggled illegally into the United States.

In interviews with HSI Special Agents, Cardona, Villatoro, and Leon positively identified Marissa BARRERA from a photo lineup as one of the persons who brought food into the house for them on different occasions. Some of these UDAs also stated that BARRERA counted the UDAs inside the house and asked the UDAs for their phone numbers to facilitate and coordinate the movement of UDAs to and from the house.

In interviews with HSI Special Agents, Villatoro, Leon, and Medrano positively identified Precilla RUIZ from a photo lineup as one of the persons who brought food into the house for them on different occasions. Some of these UDAs also stated that

RUIZ counted the UDAs inside the house. These UDAs also said that RUIZ told them she could take their foreign currency and exchange it into U.S. currency for them. The UDAs also mentioned that RUIZ left a list for the UDAs to write their names on and list what they wanted from the store. One of these UDAs also stated that RUIZ transported him to the house after he had entered the U.S. illegally.

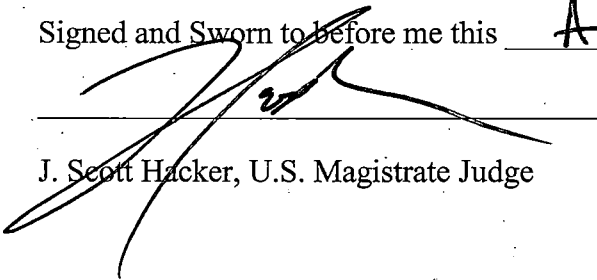
In interviews with HSI Special Agents, Villatoro, Leon, and Medrano positively identified Hiram GARCIA from a photo lineup as one of the persons who brought food into the house for them on many occasions.



Rolando Lerma Jr.  
Special Agent  
Homeland Security Investigations

Signed and Sworn to before me this

April 11/2018



J. Scott Hacker, U.S. Magistrate Judge